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3/13/2023

Via ECF

Clerk of Court's Office
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

*The request is denied. There is no
opportunity for redaction. New lawyer
commercial interests. The motion is withdrawn
pursuant to a recent complaint. Served*

RE: **Letter Motion In Support of Request to File Redacted Complaint**
*FMG Express Facility Management Group LLC v. Triplett Contracting LLC
and Timour Triplett*
Misc. Case No. 23-65

*Plaintiff
OSOR*

To the Clerk of Court:

We represent Plaintiff, FMG Express Facility Management Group LLC (“EFM” or “Plaintiff”), in the above-referenced action (the “Action”) against Defendants, Triplett Contracting LLC (“Triplett Contracting”) and Timour Triplett (“Mr. Triplett,” and together with Triplett Contracting, “Triplett”). EFM respectfully submits this Letter Motion (the “Motion”) pursuant to ECF Rule 6.14 to request that the Court issue the enclosed proposed Order directing that EFM’s proposed (a) un-redacted Complaint be maintained by the Court under seal; and (b) redacted Complaint be maintained as the publically filed version available on the Court’s docket.

EFM’s Proposed Redactions

EFM respectfully moves the Court for the relief requested in the Proposed Order because the information redacted from the Complaint itself represents, *inter alia*, (1) confidential business information that has the possibility of competitively harming EFM if disclosed (including, but not limited to, trade secrets); and/or (2) information that can be readily used to identify one of EFM’s national commercial clients who is an innocent third party not involved in this Action with privacy interests warranting protection (“EFM’s Client”). *See, e.g.*, Complaint ¶¶ 25-35; 261-289. Additionally, as detailed *infra*, EFM respectfully moves the Court to authorize the sealing of Exhibit 2 in its proposed redacted form, Exhibit 3 in its proposed redacted form, Exhibits 4 and 5 entirely, Exhibit 6 in its proposed redacted form, Exhibit 7 in its proposed redacted form, Exhibits 8, 9, and 10 in their proposed redacted forms, Exhibit 11 in its